Appl. No. 10/695,281 Amendment dated August 19, 2004 Reply to Office action of May 19, 2004

Remarks/Arguments

Please reconsider the application in view of the above amendments and the following remarks.

Status of Claims

Claims 1-21 are rejected. Claims 12-14 are amended. Claims 1-21 remain pending

Rejections under 35 U.S.C. §102

Claims 12, 13, 15 and 19 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Pat. No. 6,576,856 to Masaru et al. ("Masaru"). Applicant respectfully traverses.

Independent claim 12 recites a keypad having keycaps molded onto a top surface of a retainer sheet at keycap attachment regions. Independent claim 12 has been amended to recite that "said retainer sheet includes at least two holes extending through said thin film material at each of said keycap attachment regions" and that "each of said keycaps are molded around separate portions of said thin film material to form at least two anchor portions proximate respective said at least two holes." As mentioned in the specification, the anchor portions may include keycap anchor portions 30 or retainer anchor portions 32. The two anchor portions mechanically secure the keycap by preventing rotation of the keycap on the retainer sheet.

In contrast, Masaru discloses a key having only one anchor portion or core 4 extending through only one hole 16 in the sheet 1. See Masaru, FIG. 1. Thus, Masaru fails to disclose a keypad with at least two anchor portions to mechanically secure each of the keycaps molded onto a retainer sheet.

For these reasons, applicant submits that Masaru does not anticipate amended independent claim 12. Accordingly, applicant requests that the rejection of claims 12, 13, 15 and 19 under 35 U.S.C. 102(e) be withdrawn.

Rejections under 35 U.S.C. §103

Appl. No. 10/695,281 Amendment dated August 19, 2004 Reply to Office action of May 19, 2004

Claims 1-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Masaru in view of U.S. 5,672,405 to Plank, Jr. et al. ('Plank'). Applicant respectfully traverses this rejection.

Even if Masaru and Plank were combined in the manner suggested in the Office action, such combination falls short of the claimed invention. Independent claim 1 recites both a keycap anchor portion and a retainer anchor portion to mechanically secure each keycap. Amended independent claim 12 also recites at least two anchor portions, which mechanically secure each of the keycaps. Even if flaps were formed around the aperture in Masaru, the result would be only a single anchor portion proximate a single hole. The combination of Masaru and Plank does not produce two anchor portions to mechanically secure each keycap, as recited in independent claims 1 and 12.

For this reason, applicant submits that the Office has failed to establish a *prima facie* case of obviousness. Accordingly, applicant requests that the rejection of claims 1-21 under 35 U.S.C. 103 be withdrawn.

Applicant further submits that dependent claim 21 is separately patentable. In all of the specific embodiments described in Masaru, the core 4 is made of polycarbonate. Masaru only discloses a key top portion 12 made of ABS. The key top portion 12 covers the core 4 and is fixed by adhesive. See Masaru, col. 6, lines 6-12. Making the core 4 out of ABS when the sheet 1 is made of polycarbonate would not be desirable in Masaru because the two different materials would not adhere adequately, as mentioned in paragraph 003 of the present specification. Thus, the keys in Masaru would even be more susceptible to rotation on the sheet. Neither Masaru, nor Plank, suggests that it would be desirable to mold a keycap of ABS material on a sheet made of polycarbonate material. For this additional reason, claim 21 would not have been obvious and applicant requests that the rejection of claim 21 under 35 U.S.C. 103 be withdrawn.

Conclusion

The claims have been shown to be allowable over the prior art. Applicant believes that this paper is responsive to each and every ground of rejection cited by the Examiner in the Action dated May 19, 2004, and respectfully requests favorable action in this application. The

08/19/2004 14:18 FAX

Appl. No. 10/695,281 Amendment dated August 19, 2004 Reply to Office action of May 19, 2004

Date: 8-19-0

examiner is invited to telephone the undersigned, applicant's attorney of record, to facilitate advancement of the present application.

Please apply any charges not covered, or any credits, to Deposit Account 50-2121 (Reference Number MNRES001DIV).

Respectfully submitted,

GROSSMAN, TUCKER, PERREAULT &

PFLEGER PLLC

Kevin J Carroll, Reg. No. 36,384

55 S. Commercial Street Manchester, NH 03101 Telephone: (603) 668-6560 Facsimile: (603) 668-2970